

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

ASSENTED TO
PLAINTIFF'S MOTION TO AMEND ITS COMPLAINT

Plaintiff, Utica Mutual Insurance Company ("Utica"), moves this Court pursuant to Fed. R. Civ. P. 15(a) for leave of court to amend its complaint. Specifically, Utica seeks to add Exxon Mobil Corporation as a Defendant for liability under M.G.L., c. 21E. In support of its motion for leave to amend, Utica submits that Exxon Mobil Corporation f/k/a Exxon Corporation owned and operated a gasoline filling station at the property, which is the subject of this lawsuit, to approximately 1980. In 1974, Exxon Corporation removed two underground storage tanks in the area that is allegedly contaminated. An original of the Amended Complaint is filed herewith, and the Plaintiff requests it be docketed upon allowance of the within motion.

Respectfully submitted,

UTICA NATIONAL INSURANCE GROUP,
Defendant

**THIS MOTION IS HEREBY
ASSENTED TO BY:**

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